

Center for a Sustainable Coast

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Statement opposing the Georgia Power proposal for biomass combustion to generate electricity.

Overwhelming evidence supports our position that, in the public interest of Georgia citizens, the Public Service Commission (PSC) should deny Georgia Power's proposal to burn wood pellets as biomass energy generation.

- As is well-established, the cost of generating electricity by burning wood is at least twice as costly as conventional forms of power, and three times more expensive than using clean energy sources such as solar and wind.
- These excessive costs will be transferred to Georgia Power's residential customers, who will incur even higher power bills. These customers have already suffered monthly power bill increases exceeding 30% over the past two years due to the unjustifiable decisions of the PSC.
- As part of its rationale, Georgia Power and the PSC have claimed that the wood-burning proposal should be supported because it will help disadvantaged rural communities by creating jobs in the forestry and transportation industries. Such claims are clearly deceptive, considering that financial benefits are estimated to be at least ten times greater for timber companies, wood-pellet producers, Georgia Power executives, and Southern Company stockholders. Job creation is frequently touted by unprincipled investors to gain support for their profitable but inadequately evaluated and environmentally harmful ventures. Many community-led organizations from these disadvantaged rural communities have stated that they do not support this project.
- If energy policy is to be used for job creation, far greater benefit to both Georgia's workforce and residential energy customers would be achieved by promoting the use of rooftop solar, community-based distributed energy systems, enhanced battery storage capacity, demand management, and distribution networks to boost the benefits of these clean energy sources.
- Pollution from burning wood has been shown to produce worse particulate emissions than coal-combustion, with unwarranted release of destructive heat-trapping gases that compound the dangerous trends of climate change at a time when the national goal is to rapidly reduce them. Not only has the Department of

Energy prioritized urgent reduction in heat-trapping emissions, but for decades the U.S. Department of Defense has declared climate change a threat to national security.

- The wood pellet industry continues to be aided in their propaganda campaign, falsely promoting wood biomass as a clean, renewable energy source, despite the recent interim report by the White House Environmental Justice Advisory Committee and repeated warnings from the world's most renowned global scientists that biomass usage is even worse than coal by emitting almost double the amount of CO₂ into the atmosphere.
- The PSC has asserted that the proposal helps meet an obligation to provide a diversification of energy sources by adding the combustion of 'biomass' to Georgia Power's portfolio. However, the only reason this obligation exists is because the PSC created it at Georgia Power's request in its 2022 Integrated Resource Plan (IRP). The IRP should be amended to remove any requirement for biomass combustion because of its costs and unacceptable environmental consequences.
- Our organization opposes Georgia Power's proposal to install an 80 MW biomass plant in Jesup, Georgia. This plant will harm local residents, and it fundamentally conflicts with the public interest when, instead, our state should be prioritizing its obligation to help serve the national interest and improving the quality of life for all Georgians by reducing heat-trapping emissions.

In addition to these reasons for opposing the wood-combustion proposal under consideration by the PSC, we submit the following information about the destructive impacts of the wood-pellet industry itself, which further strengthens the reasons for our resolute opposition.

The Environmental Harms of Wood Pellet Manufacturing

[Based on a 2022 position of the NAACP, "Resolution in Opposition to Wood Pellets Manufacturing and Use of Wood-Bioenergy."]

Wood pellets are manufactured from trees cut from Georgia's invaluable forests, which provide a far greater public benefit by sequestering carbon. The combustion of wood pellets, sometimes referred to as bioenergy or wood biomass, is still often misrepresented as renewable energy, which conceals the extensive environmental damage caused by burning wood.

Aside from the pollution caused by burning the pellets, manufacturing them has its own record of environmental negligence. Production of wood pellets has been proven to be hazardous and toxic, a flagrant form of environmental injustice caused by wood biomass

industries locating their operations in low-income areas. In addition to significant public outcry against the pollution caused by wood pellet production and combustion, legal actions have arisen to respond to various procedural violations related to this project and its blatant disregard for Air Quality Permit rules.

Manufacturing wood pellets causes significant risks to human health from toxic levels of exposures to particulate matter (PM_{2.5}), volatile organic compounds (VOCs), nitrogen oxide (NO_x), carbon monoxide (CO), carbon dioxide (CO₂), and methanol nonanaldehyde. No alleged economic benefits can justify the production and combustion of wood pellets when these pollutants endanger Georgia citizens.

These industries have a pattern of targeting states like Georgia with lax environmental oversight, then skirting provisions of the Clean Air Act by grossly underestimating the amount of dangerous toxins they will be emitting, thereby avoiding EPA oversight and investment in the required Best Available Control Technology.

Findings of a 2018 report of former EPA enforcement officials who founded the Environmental Integrity Project (EIP) showed the following:

- *In 2017, at least a third of the wood pellet plants (7 out of 21) violated their permit limits by releasing illegal amounts of pollution, while another four plants had faulty permits issued by state governments that failed to require pollution control equipment required by the federal Clean Air Act. Overall, more than half of the plants (11 out of 21) either failed to keep emissions below legal limits or failed to install required pollution controls.*
- *The 21 wood pellet mills exporting to Europe emit a total of 16,000 tons of health-threatening air pollutants per year, including more than 2,500 tons of PM_{2.5}, 3,200 tons of NO_xs, 2,100 tons of CO, and 7,000 tons of volatile organic compounds. These plants also emit 3.1 million tons of greenhouse gases annually. While many European countries turn to wood pellets to cheaply satisfy carbon emission goals, this market is extremely vulnerable to policy that would close the loopholes currently in place that define wood pellet biomass combustion as a renewable, carbon-neutral energy source.*
- *Of the 5 largest operating facilities, at least eight have had fires or explosions since 2014, including at factories in North Carolina, Georgia, Arkansas, Alabama, and Texas, with vast amounts of air pollution and injury to employees. A fire at the German Pellets storage silo in Port Arthur, Texas, burned for two months in 2017, releasing smoke that forced dozens of local residents to seek medical attention and killed a worker during cleanup.*